



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

DEVAL L. PATRICK  
Governor

RICHARD K. SULLIVAN JR.  
Secretary

KENNETH L. KIMMELL  
Commissioner

**November 14, 2013**

Mr. Peter Barrett  
Dampney Company, Inc.  
85 Paris Street  
Everett, MA 02149

RE: **EVERETT** - Metropolitan  
Boston/Northeast Region  
310 CMR 7.02 NON-MAJOR  
COMPREHENSIVE PLAN APPLICATION  
Transmittal No. W051907  
Application No. MBR-04-IND-014  
**MODIFIED FINAL APPROVAL**

Dear Mr. Barrett:

The Metropolitan Boston/Northeast Regional Office of the Department of Environmental Protection, Bureau of Waste Prevention, has completed its technical review of the plan application listed above. This application concerns your proposal to increase emissions from existing manufacturing operations at your facility located at 85 Paris Street in Everett, Massachusetts. The submitted application bears the seal and signature of Ms. Dorothy Austin, Massachusetts P.E. No. 37437. On July 17, 2013, Golder Associates, on behalf of Dampney Company, submitted a written request to allow the previously locked equipment at this facility to be utilized without any additional increase in facility-wide emission limits.

The Department has determined that your application is administratively and technically complete and that your proposal is in conformance with current air pollution control engineering practices. Therefore, the Department hereby grants **Modified Final Approval** for your proposal, with the conditions listed below.

Please review the entire Modified Final Approval carefully, as it stipulates the particular conditions with which the facility owner/operator must comply in order for the facility to be operated in compliance with the Regulations. Failure to comply with this Modified Final Approval will constitute a violation of the Regulations and can result in the revocation of the Modified Final Approval.

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>



Printed on Recycled Paper

A. EQUIPMENT DESCRIPTION

Dampney Company, Inc. (Dampney) manufactures corrosion resistant protective coatings for the refining, chemical processing, primary metal, utility, pulp and paper and OEM industries at its facility located at 85 Paris Street in Everett, Massachusetts. The basic process operations at the facility consist of batch milling and mixing of raw materials at ambient temperature and pressure. The process equipment at the facility consists of fixed and portable mixing tanks, high and low shear mixers, ball mills, shot mills, holding tanks, a horizontal media mill, and fixed holding tanks. Attachment I contains a complete list of process equipment and associated capacities. The equipment in the “new building” has never been used and is currently locked out. Dampney has submitted a request to utilize this equipment, while maintaining the facility-wide emission limits found in Table I below without any increases. This Modified Final Approval now contains a revised Attachment I which includes the equipment in the “new building” which was previously locked out, but will now be available for operation under this Modified Final Approval.

The existing facility operates three cyclone/baghouse sets for dust collection purposes during dry pigment loading operations. The overall particulate control efficiency is greater than 99 percent and equates to an annual particulate emission rate of approximately 20 pounds in calendar year 2004, after control.

B. EMISSIONS

Table I below contains the emission limitations of volatile organic compounds (VOC) and total hazardous air pollutants (HAPs) for the subject facility:

Table I

Process Emissions	Total HAPs Emission Limitation in Tons per Month	Total HAPs Emission Limitation in Tons per Twelve Month Rolling Calendar Period	VOC Emission Limitation in Tons per Month	VOC Emission Limitation in Tons per Twelve Month Rolling Calendar Period	Exempt VOC Emission Limitation in Tons per Month	Exempt VOC Emission Limitation in Tons per Twelve Month Rolling Calendar Period
Total Facility-wide Emissions	2.5	9.9	2.5	9.9	1.0	5.0

Note: Dampney currently ships hazardous waste off site. The amount of waste shipped out will continue to be tracked and subtracted from the facility’s overall air emissions.

C. OPERATIONAL AND USAGE REQUIREMENTS

Dampney shall comply with the following operational and usage requirements:

- (1) All HAPs and VOC containing materials, such as solvents and cleanup solutions, shall be transported and stored in tightly covered containers. All such containers shall be covered when not in use and covered to the greatest extent possible when in use.
- (2) All cleaning rags used in conjunction with the cleaning solutions shall be placed in tightly covered containers when not in use, and shall be collected for proper recycling or disposal.
- (3) In compliance with 310 CMR 7.18(27), all coating mixing tanks must be covered with lids meeting the regulatory specifications and the facility must keep records regarding repair and replacement of mixing tanks.

D. SPECIAL CONDITIONS

- (1) Dampney shall comply with the Emission Limitations in Table I above and shall adhere to the Operational and Usage Requirements contained in Section C. above.
- (2) That a copy of this Final Approval letter shall be posted at or near the subject equipment.
- (3) Dampney shall continue to evaluate and utilize low and no VOC materials and clean-up solutions which are technically and economically feasible in accordance with 310 CMR 50 (Toxic Use Reduction).
- (4) Dampney shall maintain adequate on-site records to document compliance with the emission limitations as stated in Table I above. These records shall include a list of the VOC-containing and HAPs-containing materials used during each month, the VOC and HAPs content of each material, and the actual emissions of VOC and HAPs for the month as well as the prior 11 months. Said records shall be made available to Department personnel upon request, and shall be kept on site for a minimum of five (5) years. (An electronic version of the On-site Record-keeping Form in Microsoft Excel format can be obtained at <http://www.mass.gov/dep/bwp/daqc/resannrp/download.htm>).

- (5) Dampney shall be required to submit, in writing, an Exceedance Report to the Department should the facility exceed any limitation/restriction established within this Final Approval. Said Exceedance Report shall be submitted, in writing, to this Office within seven (7) days of determination of the exceedance of the limitation. The Exceedance Report shall include identification, duration, reason for the exceedance, and remedial action plan to prevent future exceedances.
- (6) This Approval consists of the application materials and this Approval letter. If conflicting information is found between these two documents, then the requirements of the Approval letter shall take precedence over the documentation in the application materials.

#### E. GENERAL CONDITIONS

- 1) That should any nuisance condition(s) be generated by the operation of this facility, then appropriate steps shall immediately be taken by Dampney Company, Inc. to abate the nuisance condition(s).
- 2) That Dampney Company, Inc. shall continue to investigate the feasibility of implementing alternative technologies or reformulated raw material inputs which will lead to the decrease of overall emissions from the subject facility to the environment (air, water, solid waste). The subject facility shall seek assistance from outside sources such as coating suppliers, vendors, or the Office of Technical Assistance [which is located at the Executive Office of Environmental Affairs, 100 Cambridge Street, Suite 900, Boston, Massachusetts (Telephone No. 617-626-1060)]. Dampney Company, Inc. personnel shall record any information supplied to them relative to reducing overall emissions and pollution prevention techniques. This information as well as any progress toward decreasing overall emissions to the environment shall be recorded in an Environmental Logbook (see General Condition No. 3 below).
- 3) That Dampney Company, Inc. shall maintain an Environmental Logbook, or equivalent record keeping system, which shall record actions associated with environmental issues and overall emissions changes at the facility. The facility shall record information such as the results of federal, state, or local environmental inspections; maintenance or corrective actions related to pollution control equipment; and measures taken to lower overall emissions to the environment (air, water, solid waste). This Logbook, or equivalent record keeping system, shall be made available to Department personnel upon request.
- 4) That Dampney Company, Inc. shall accurately report its air emissions to the Department on Emission Statements, according to the requirements of Regulation 310 CMR 7.12.

- 5) Dampney Company, Inc. shall allow Department personnel access to the plant site, buildings, and all pertinent records at all times for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- 6) The Department has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Environmental Affairs, for air quality control purposes, was not required prior to this action by the Department. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and Regulation 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions" which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report at a later time.
- 7) Please be advised that this Modified Final Approval does not negate the responsibility of Dampney Company, Inc. to comply with this or any other applicable federal, state, or local regulations now or in the future. Nor does this approval imply compliance with this or any other applicable federal, state, or local regulations now or in the future.
- 8) Failure to comply with any of the above stated conditions will constitute a violation of the "Regulations", and can result in the revocation of the Approval granted herein to operate the described facility.

#### F. APPEAL PROCESS

This Plan Approval is an action of the Department. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and be postmarked within twenty-one (21) days after the date you receive this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Approval, please contact Mun Wong at (978) 694-3286, or at the following address: Massachusetts Department of Environmental Protection, Northeast Regional Office, 205B Lowell Street, Wilmington, MA 01887.

Sincerely,

---

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

Mun S. Wong  
Environmental Engineer  
Bureau of Waste Prevention

---

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

James E. Belsky  
Permit Chief  
Bureau of Waste Prevention

JEB/Emw/mw  
P:\MWONG\W051907 Modified Final

cc: Board of Health, City Hall, Everett, MA 02149  
Fire Headquarters, 384 Broadway, Everett, MA 02149  
Mary Persky, DEP, NERO  
Ecopsy - Yi Tian, DEP, Boston, Marc Altobelli, DEP, NERO  
Golder Associates, Inc., 105 Bradford Road, Suite 420, Wexford, PA 15090  
ATTN: Ms. Dorothy Buckoski

**Attachment I**  
**List of Process Equipment in Use**

**I. Equipment in Old Building**

Type of Equipment	No. Units	Capacity
Ball mills	7	50 – 250 gallons
Fixed mixing tanks <sup>1</sup>	3	400 gallons
High shear mixer for fixed tank <sup>2</sup>	1	NA
Low shear mixer for fixed tank <sup>3</sup>	1	NA
High shear mixers for portable cans	4	NA
Portable cans (mixing tanks/drums)	NA	55 – 100 gallons
Vibratory filter	1	20 gpm
Shot mill	1	18 gallons
Horizontal media (bead) mill	1	1 liter
Ribbon mills <sup>4</sup>	2	40 & 50 gallons

**II. Equipment in New Building**

Type of Equipment	No. Units	Capacity
Fixed mixing tank <sup>5</sup>	1	1,800 gallons
Holding tank <sup>6</sup>	1	1,800 gallons
Fixed mixing tanks <sup>5</sup>	2	350 & 750 gallons
Shot mill	2	18 gallons
Fixed holding tanks <sup>6</sup>	2	350 & 750 gallons

---

<sup>1</sup> Includes two mixing tanks and one letdown tank.

<sup>2</sup> Serves two mixing tanks.

<sup>3</sup> Paddle in letdown tank.

<sup>4</sup> Two ribbon mills in VOC service. There is a third ribbon mill, but it is dedicated for use to mix Bentonite clay and water.

<sup>5</sup> With fixed high shear mixer(s).

<sup>6</sup> With fixed paddle mixer(s).